



## Valley Clean Air Now Comments on Cap-and-Trade Auction Proceeds Second Investment Plan

Thank you for the opportunity to comment on the Draft Second Investment Plan. We are heartened to see the Air Resources Board's commitment to creating meaningful change in disadvantaged communities through reinvestment of Cap and Trade funds and offer the following comments and suggestions:

**Support for Cross Cutting Approaches.** *Section VI, Current Strategy Gaps and Draft Investment Concepts* is an excellent approach to continue to evolve the planning process in order to achieve effective carbon reduction investments and economic returns.

Specifically, the idea of using "cross-cutting approaches" to streamline program delivery can create momentum toward maximum environmental, economic, and public health benefits in disadvantaged communities. By preferentially funding projects with achieve multiple benefits, a suggestion that has been made by the independent Legislative Analyst's Office as well as by many stakeholders, the state can make the most use of the funds it has been tasked with reinvesting. In addition, we believe that it is possible, and highly advantageous, to stack multiple GGRF-funded programs within disadvantaged community households, creating transformative change in these communities. For instance, Valley Clean Air Now coordinates with Fresno EOC to make solar installations available for low-income residents who qualify for incentives for a battery electric vehicle.

**Enable Program Coordination Through Unified Applicant Management & Program Analytics.**

Attempting to align programs at the agency level may be difficult due to relatively small differences in quantification methodologies, approach, and guideline requirements, which is amplified by the number and breadth of agencies involved. As a potential solution we recommend including a third section under *Section VI. A. Potential Cross Cutting Approaches* for Program Design and Structure. Based on our experience with operating EFMP Plus-Up in the San Joaquin Valley, we believe there is an opportunity to coordinate at the program level using a universal customer application and reporting system as the basis for cross-program coordination that can streamline the intake and eligibility verification process and ensure that consistent reporting metrics are used. This avoids the need to alter existing statutes and program guidelines and allows for coordination at the grassroots level where it is most needed. Cross-program coordination can include most aspects of program design:

- Outreach
- Education and activation
- Program delivery
- Accounting
- Reporting



The key element of this approach is that it would allow agencies to stack GGRF programs for a single customer or community, creating ease of access and utilization for the general public. The universal application and reporting system can be developed as a common application usable by most, if not all, GGRF programs. This common application could collect basic information broad enough to cover all programs, with modules specific to the needs of each issue area based on a constituent's interest or qualifications. This way the same application could work for all program types, with each program able to use the core application plus the modules that meet their specific needs.

It would be a relatively straightforward process to assess each GGRF program for opportunities to coordinate with other programs, and map these potential interconnections. This coordination can cross between similar program types, such as various clean transportation and transit programs within CARB's Clean Transportation Funding stream which share commonalities, or between agencies where alignment can be encouraged across housing, transportation, clean energy, energy efficiency, natural resources and waste diversion programs. As new programs are developed, agencies can offer new opportunities for program stacking and continue to build out the universal application.

**Deep Outreach in Disadvantaged Communities and Rural Areas.** A universal application and reporting system approach could also help to alleviate the challenges with outreach in disadvantaged communities and rural areas. A common application system, designed to be inclusive of the needs of disadvantaged residents, will lower barriers to participation and make GGRF programs appear more attractive and understandable to these residents. Based on our first-hand experience establishing a successful program for rural and disadvantaged communities in the San Joaquin Valley, outreach will not be effective in these communities unless perceived barriers are eliminated and the application process is made as simple as possible. Valley CAN has developed a universal screening mechanism, similar to the universal application, which allows our organization to guide participants through the application process and reduce the complexity which acts as a barrier to participation.

Given the San Joaquin Valley's leadership and experience in establishing integrated programs focused on disadvantaged and rural communities, the Valley could host a pilot to test this approach and report back to the Air Resources Board on successes and further barriers which may need to be addressed. Program administrators in the Valley have already conducted early meetings and forged agreements to begin working together on participant outreach, screening, and reporting which would allow this pilot to begin as early as January 2016.

Thank you for considering these comments. Please contact Tom Knox at [tom.knox@valleycan.org](mailto:tom.knox@valleycan.org) or (916) 273-8886 if you need any additional information.